

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE SOLARWINDS CORPORATION
SECURITIES LITIGATION

Case No. 1:21-cv-00138-RP

CLASS ACTION

JURY TRIAL DEMANDED

**LEAD PLAINTIFF'S NOTICE OF INTENTION NOT TO AMEND CONSOLIDATED
CLASS ACTION COMPLAINT**

Lead Plaintiff New York City District Council of Carpenters Pension Fund (“Lead Plaintiff”) respectfully submits this notice to inform the Court that Lead Plaintiff does not intend to amend the Consolidated Complaint for Violations of the Federal Securities Laws (ECF No. 26).

In its March 30, 2022 Order (ECF No. 64), the Court denied in significant part Defendants’ motions to dismiss, sustaining Lead Plaintiff’s claims against (i) Defendants SolarWinds and Brown for violations of Section 10(b) of the Securities Exchange Act of 1934; and (ii) Defendants Brown, Thompson, Silver Lake, and Thoma Bravo for violations of Section 20(a) of the Securities Exchange Act of 1934. Accordingly, the case is to proceed to discovery. Therefore, Lead Plaintiff requests that the Court schedule a Case Management Conference under Fed. R. Civ. P. 16 no later than May 13, 2022, or at the Court’s earliest convenience, in advance of which the parties will hold their Rule 26(f) conference in accordance with the local rules.

DATED: April 5, 2022

MARTIN & DROUGHT, P.C.

Gerald T. Drought
State Bar No. 06134800
Federal Bar No. 8942
Frank B. Burney
State Bar No. 03438100
Weston Centre
112 E. Pecan Street, Suite 1616
San Antonio, Texas 78205
Tel: (210) 227-7591
Fax: (210) 227-7924
gdrought@mdtlaw.com

*Liaison Counsel for Lead Plaintiff New York
City District Council of Carpenters Pension
Fund*

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s/ Jonathan D. Uslaner

John J. Rizio-Hamilton (admitted *pro hac vice*)
Jonathan D. Uslaner (admitted *pro hac vice*)
Benjamin W. Horowitz (admitted *pro hac vice*)
Thomas Z. Sperber (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
Johnr@blbglaw.com
JonathanU@blbglaw.com
Benjamin.Horowitz@blbglaw.com
Thomas.Sperber@blbglaw.com

*Lead Counsel for Lead Plaintiff New York City
District Council of Carpenters Pension Fund
and the Class*